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August 15, 2018

VIA ECF

The Honorable George B. Daniels United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007

RE: In re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN) This document relates to: Ashton, et al. v. al Qaeda Islamic Army, et al., 02-cv-6977(GBD)(SN)

Dear Judge Daniels,

On August 14, 2018, our office filed a Motion for Final Judgments on behalf of 128 of the *Ashton* plaintiffs listed in Exhibit A attached to the Kreindler Declaration (referred to therein as the "*Ashton VI*" claimants). See 02-md-1570 (S.D.N.Y.)(GBD)(SN), Doc. Nos. 4101; 4101-1.

In the attached exhibit, *Ashton VI* claimant, Richard V. Calia (No.18), the brother of 9/11 decedent Dominick E. Calia, is correctly listed as the victim's brother, however, his requested presumptive solatium damages award was inadvertently listed as \$8.5 million. Pursuant to this Court's framework, his requested presumptive solatium damages award amount should be \$4.25 million. As such, we have corrected the requested presumptive award amount in the attached exhibit, also entitled Exhibit A. We request that when entering an Order on the relief requested in the pending Motion, the Court rely on the attached Exhibit A filed today, August 15, 2018, in lieu of the original exhibit attached to the Kreindler Declaration.

Thank you for your consideration of this matter.

Respectfully,

KREINDLER & KREINDLER LLP

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Enclosure

cc: All MDL Counsel of Record (via ECF)